1 The Honorable Benjamin H. Settle 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT TACOMA 9 10 COMMANDER EMILY SHILLING, et al., Case No. 2:25-cv-241 (BHS) 11 Plaintiffs, 12 SUPPLEMENTAL DECLARATION v. OF BLAKE DREMANN 13 DONALD J. TRUMP, in his official capacity as President of the United States, et al., 14 Defendants. 15 16 I, Blake Dremann, declare as follows: 17 1. I write this declaration to supplement the declaration I signed on February 12, 18 2025, and submitted in support of the Motion for Preliminary Injunction in this matter on 19 February 19, 2025. See ECF No. 25. 20 2. I have served more than eighteen years but less than twenty years of total active 21 duty in the United States Navy. Serving in the U.S. Navy has been not only a career for me, but 22 it is also my calling. 23 3. According to the Navy's "FAQ: Prioritizing Military Excellence and Readiness" 24 regarding NAVADMIN 055/25 (ECF No. 79-1), which pertains to the Navy's implementation of 25 the Department of Defense ("DoD") February 26, 2025 guidance (ECF No. 58-7) and Executive 26 Order 14183, "Sailors with over 18 years but less than 20 years of total Active-Duty service by 27 the deadline are eligible for early retirement under Temporary Early Retirement Authority 28 Lambda Legal Defense and **Human Rights** SUPPLEMENTAL **Perkins Coie LLP Education Fund, Inc. Campaign Foundation** DECLARATION OF BLAKE 1201 Third Avenue, Suite 4900 120 Wall Street, 19th Floor

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(TERA)." A true and accurate copy of the Navy's "FAQ: Prioritizing Military Excellence and Readiness," updated March 14, 2025, is attached as **Exhibit A** to this supplemental declaration.

- 4. The Navy's FAQ guidance further clarifies that the deadline to "request voluntary separation or retirement [is] no later than 2359Y (UTC-12:00), Friday, 28 March 2025" and that a service member who "does not request voluntary separation by March 28, 2025, ... will be subject to involuntary separation and no longer be eligible for voluntary separation benefits and may be required to pay back any bonus or incentive pays received where the required obligation has not been met." This includes early retirement benefits.
 - 5. It is not my desire to separate or retire from the United States Navy at this time.
- 6. Aside from causing me to lose the career of military service I have dedicated my life to, involuntary separation from the Navy pursuant to Executive Order 14183 and its implementing guidance would have dire financial repercussions for me and my family, as not only would I lose my livelihood but would lose benefits and remuneration to which I would be entitled to under TERA according to the guidance.
- 7. Thus, because Executive Order 14183 and its implementing guidance remain in effect, the impending deadline of March 28, 2025 is fast approaching, and I am currently forward deployed in the USS Frank Cable, a submarine tender, in Guam, on March 20, 2025, I formally submitted my request for early retirement under TERA pursuant to NAVADMIN 055/25 and section 4.4(a)(8) of the DOD February 26, 2025 Guidance. *See* ECF Nos. 58-7 and 79-1.
- 8. I am opting for early retirement under TERA solely because not doing so would result in my involuntary separation as well as the potential loss of benefits and discharge status available through so-called "voluntary separation." The loss of these benefits would result in additional harm to my family and me.
- 9. Under NAVADMIN 055/25, "[t]he latest date available for ... retirement under this policy is no later than 1 June 2025." Given my responsibilities and desire to continue to serve my country as part of the U.S. Navy, I have requested the latest possible date of June 1, 2025 for my early retirement.

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- 10. It is my hope and desire that a preliminary injunction in this case would toll such separation date and that should the courts ultimately find in our favor that I am able to withdraw the application for early retirement under TERA.
- 11. The only reason I am proceeding with my early retirement request is to preserve my benefits under TERA. I feel that I have been forced and coerced into opting for so-called "voluntary separation" under Executive Order 14183 and its related guidance. I do not wish to retire or separate from the United States Navy currently.

12. I declare under the penalty of perjury that the foregoing is true and correct.

DATED: March 24, 2025



Blake Dremann